

Des Gillen

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April 29, 2022

City of Toledo
Division of Environmental Services
348 S. Erie Street
Toledo, OH 43604

Attn.: Mr. Peter Park

**RE: 2021 Title V Permit Annual Compliance Certification
For the Period January 1, 2021, through December 31, 2021
BP-Husky Refining LLC, Facility ID: 04-48-02-0007**

Dear Mr. Park:

This letter and its attachments represent the Annual Certification of Compliance for the BP-Husky Refining LLC (BP-Husky) Title V Permit (P0104782) for the operating period January 1, 2021, through December 31, 2021. A Minor Title V Permit Modification (P0128721) was issued on November 18, 2021, to incorporate the requirements of P0124661 for the Crude Vac 2 Margin Improvement Project. Some of the specific citations are different than the Title V Permit P0104782 that was issued on July 13, 2017. For simplicity, this Annual Compliance Certification report and its attachments address all federally enforceable emissions limitations, standards, and work practices in the BP-Husky refinery's Title V Permit (P0104782). The requirement for this certification is outlined in the General Terms and Conditions in the Title V Permit (P0104782), Part A, Condition 13.d.

Attachment A explains the approach and nomenclature that BP-Husky has used in preparing this report.

Attachment B provides a tabulation of all known Title V deviations that occurred between January 1 through December 31, 2021, for the terms and conditions of the Title V Permit (P0104782), issued on July 13, 2017. Attachment B includes separate tables of deviations for Parts A, B and C of the permit. The tables in Attachment B follow the general format of the forms that Ohio EPA (OEPA) has provided for this purpose. This is the same general format that has been used in reporting annual certification in prior years from 2007 to 2020. The certification has been prepared following OEPA's guidance issued in 2006 that only permit conditions with actual deviations should be reported. Table C also includes a known deviation to the permit to install (PTI) terms and conditions for which a Title V Minor Permit Modification had been submitted, but had not yet been incorporated into this Title V.

In early 2022, BP-Husky completed an internal review of its 2021 Fugitive Dust documentation. During this review, it was discovered that the fugitive dust inspection documentation indicated that control measures were needed based on the dust inspection; however, the watering reports could not be located to show that the required watering took place. Deviations from these requirements were not properly reported in either the 1H2021 or 2H2021 fugitive dust semimanual reports nor were they included in the quarterly Title V Deviation reports that were submitted for 2021. These deviations will be noted in the 1H2022 fugitive dust semimanual report. The Title V citations for these deviations are included in the F001, Plant Roadways, Part C deviations in Attachment C.

This certification was prepared in accordance with a system designed to assure that qualified personnel gathered and evaluated all reasonably available information relevant to compliance with the terms and conditions of the applicable Part 70 permit during the 2021 operating year, and that they then reported their conclusions with respect to compliance. Based on my inquiry, I believe the contents of the enclosed report to be true, accurate, and complete; however, this certification should not be read to imply that I have personally reviewed all documentation underlying the compliance determination for the terms and conditions of BP-Husky's Title V Permit. Nor should it be read to imply that the persons responsible for gathering and evaluating the information relied on in making the certification have reviewed all information generated by the operations at the facility. As with any regulatory program, it is possible that there were deviations from permit conditions which may not have been identified in the normal course of a good faith effort to implement the required compliance efforts under these programs.

In addition, this certification should not be construed as containing any admissions that the reported deviations or other events are violations of any applicable requirement. In some cases, applicable rules contain various defenses and/or exemptions, which may excuse particular deviations. In other cases, the question of whether a particular event constituted a deviation or violation may be subject to interpretational disputes. In still other cases, events may be reported as deviations out of an abundance of caution despite the fact there is insufficient factual information to determine whether the deviation actually occurred.

If you have any questions regarding this submittal, do not hesitate to contact Ashley Zapp at Ashley.zapp@bp.com or (567) 698-4410.

Sincerely,

DocuSigned by:

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Des Gillen
President - BP-Husky Refining LLC

Attachments

Attachment A

BP-Husky Refining LLC Annual Certification Report "Approach and Nomenclature"

- The certification report is submitted using tables that follow the general format of the forms that OEPA has provided for this purpose. This is the same general format that has been used in reporting annual certification in prior years from 2007 to 2020. It is prepared following OEPA's guidance issued in 2006 that we should only report permit conditions with actual deviations.
- The first column in the Certification table provides the Permit Term Number. Most of the permit term numbers have a fairly straightforward, one-to-one relationship with individual permit conditions.
- The majority of the excursions or deviations presented in this annual certification were already reported to OEPA and Toledo Division of Environmental Services (TDES) in one of our Title V quarterly or semiannual deviation reports. The specific report, or reports, that provide the details of each deviation incident are identified in the column entitled: "Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)".
- BP-Husky has identified some instances where a previously reported incident constitutes a deviation of additional permit conditions of the permit than had been previously identified. For example, the quarterly deviation report may have highlighted the deviation in relation to an explicit condition in Part C of the permit but missed the fact that it also constitutes a violation of a condition in Part B of the permit. In such instances, the details about the new citation have been added in the column entitled: "Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken".
- BP-Husky has also found some instances, where upon further investigation; an erroneous deviation was reported from a Title V Permit term in one of the quarterly or semiannual deviation reports that were submitted. In such instances, the detail about the erroneously reported citation has been added in the column entitled: "Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken" for related citations that were added or correctly reported.

Title V Compliance Certification

A. Facility Name: BP-Husky Refining, LLC

B. Facility Address: 4001 Cedar Point Road, Oregon, OH 43616

C. Facility ID [10 digits] : 04-48-02-0007

D. Final Title V Permit Issuance Date [Multiple dates should be identified if the permit was modified or renewed during the reporting year]:

Original Title V Permit issued 9/27/04

Title V Renewal Permit P0104782, effective August 3, 2017.

Minor Title V Permit Modification P0128721, was issued on November 18, 2021.

E. Reporting Period (usually the preceding calendar year): 2021 Total pages in this Certification: 33

F. Identification of intermittent compliance [add rows as necessary or indicate in the last row of the table below if attaching an Air Services

Compliance Certification print out, or a facility-generated printout that is equivalent to what is detailed in the table below].

*Identify the Emissions Unit and the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Excursions/Deviations	
		Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Probable Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
See attached Tables for details			
	Place an "X" in the box to the left if you have attached a facility-generated printout in addition to or lieu of completing the rows above (this information must be uploaded to Air Services, along with this completed Certification).		

*For IEUs, include the permit number or SIP-based applicable requirement rule reference

G. Any material information not established through the applicable permit terms and conditions that may indicate non-compliance [add rows as necessary].

*Identify the Emissions Unit or briefly describe the requirement	Description of material information
None	

*For IEUs, include the permit number or SIP-based applicable requirement rule reference

H. Certification of Compliance:

Except as indicated in Sections F and G above, all emissions units subject to one or more applicable requirements operated in continuous compliance with all federally enforceable permit terms and conditions throughout the calendar year identified in Section E above.

I, being the individual specified in OAC rule 3745-77-03(D), hereby affirm that every permit term and condition, including every permit term and condition or SIP-approved rule reference for each insignificant emissions unit that is based on an applicable requirement, has been reviewed with respect to intermittent or continuous compliance. I, being the individual specified in OAC rule 3745-77-03(D), hereby affirm that the facility identified in Sections A through C above was in continuous compliance with every permit term and condition during the reporting period, except as specified in Section F and Section G of this certification. I, being the individual specified in OAC rule 3745-77-03(D), hereby affirm that the statements made in this Title V Compliance Certification, which I am submitting to Ohio EPA via the Ohio EPA's *Air Services* software on the date indicated in Air Services, are true, accurate and complete, based on information and belief formed after reasonable inquiry. My completion of the attestation as part of the PIN process within Air Services also serves as my electronic signature and certification of this Title V Compliance Certification. But note, in completing the attestation as part of the PIN process within Air Services, I am not attesting that I have personally examined and am familiar with this facility's compliance with every permit term and condition covered by the certification period, I am only attesting that I have personally examined this Compliance Certification and am familiar with the information submitted herein as being true, accurate and complete based on information and belief formed after reasonable inquiry, as the Certification so states.

Note: If confidential or trade secret information is included in this submission, a copy of this Title V Compliance Certification must be submitted (i.e., post marked) to the Administrator of the United States Environmental Protection Agency c/o Director, Air and Radiation Division, U.S. EPA Region 5, 77 W. Jackson Blvd., AE-17J, Chicago, Illinois 60604. If required, it is recommended that this compliance certification be sent by certified mail to U.S. EPA. Otherwise, submission of this Certification via Air Services meets the requirement to submit a copy of the Compliance Certification to U.S. EPA.

DocuSigned by:

90F20640AD13450...
Authorized Signature

Date

Des Gillen
Name (Please Print or Type)

President, BP-Husky Refining LLC
Title

Attachment B

Deviations of the revised Title V Permit P0104782

January 1, 2021, through December 31, 2021

			Excursions/Deviations	
Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
A.19.	LDAR monitoring program visual inspection	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21	

Title V Permit Citation	All Citation text associated with Permit terms	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
B.2.b)(2)b.i.	[40 CFR 63.648(a)(1)] For purposes of compliance with 40 CFR Part 63.648, the provisions of 40 CFR Part 60, Subpart VV apply only to equipment in organic HAP service, as defined in 40 CFR Part 63.641,	Visual inspection records	I	First Quarter Deviation Report, submitted 4-30-21	
B. 2. d) (4) a.	60.592a(a) Standards: Comply with the requirements of 40 CFR 60.482-1a to 60.482-10a of Subpart VVa no longer than 180 days after initial startup.	Visual inspection records	I	First Quarter Deviation Report, submitted 4-30-21 Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B. 2. d) (5) n.	60.482-6a(a) through (e) Standards: Open-Ended Valves or Lines: Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 60.482-1a(c) and 40 CFR 60.482-6a(d) and (e).	LDAR Visual Observations	I	First Quarter Deviation Report, submitted 4-30-21 Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B. 2. d) (5) o.	60.482-7a(a) through (h) Standards-Valves in Gas/Vapor Service in Light Liquid Service: Valves are monitored monthly to detect leaks (>500 ppm). A valve that begins	Visual inspection records	I	First Quarter Deviation Report, submitted 4-30-21 Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B. 3. a) (1)	No later than the start-up of the Coker Gas Plant (P068), the permittee shall install, calibrate, operate, and maintain instrumentation to monitor and record the concentration by volume (dry basis) of total sulfur (expressed as SO ₂) in the refinery fuel gas burned in each of the heaters and boilers listed in this permit (except for heaters firing fuel gas from the East Side Mix Drum).	Continuous Monitoring System	I	Second Quarter Deviation Report, submitted 7-30-21	
B. 4. a) (13) e.	60.105(a)(4)(iii) The permittee shall conduct performance evaluations for each H ₂ S monitor according to the requirements of 40 CFR 60.13(c) and Performance Specification 7 of appendix B to part 60. The permittee shall use Method 11, 15, or 15A of appendix A-5 to part 60 or Method 16 of appendix A-6 to part 60 for conducting the relative accuracy evaluations.	Reporting	I	First Quarter Deviation Report, submitted 4-30-21	
B. 5. a) (5) d.	The permittee shall install, operate, and maintain equipment to continuously monitor and record NO _x emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60. The permittee shall maintain records of data obtained by the continuous NO _x monitoring system including, but not limited to:	Continuous Emissions Monitoring System	I	First Quarter Deviation Report, submitted 4-30-21	

Title V Permit Citation	All Citation text associated with Permit terms	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
B. 5. a) (6) f.	60.107a(a)(2)(ii) The permittee shall conduct performance evaluations for each H2S monitor according to the requirements of 40 CFR 60.13(c) and Performance Specification 7 of appendix B to part 60. The owner or operator shall use Method 11, 15, or 15A of appendix A-5 to part 60 or Method 16 of appendix A-6 to part 60 for conducting the relative accuracy evaluations. The method ANSI/ASME PTC 19.10-1981, "Flue and Exhaust Gas Analyses," (incorporated by reference-see 40 CFR 60.17) is an acceptable alternative to EPA Method 15A of appendix A-5 to part 60.	Reporting	I	First Quarter Deviation Report, submitted 4-30-21	
B. 7.	Revisions to 40 CFR 63 Subparts CC and UUU (Refinery MACT I and II) were promulgated on December 1, 2015 as part of EPA's Petroleum Refinery Sector Risk and Technology Review Rule (RSR) and further revisions and clarifications were promulgated on July 13, 2016. This BP-Husky Title V permit includes the Refinery Rule (RSR) MACT requirements that apply to the refinery and that are effective through February 1, 2017. However, the requirements of the RSR that have compliance dates after February 1, 2017 (and thus are not yet effective) are only generally referenced at the Subpart level in this section of the permit. The compliance dates and detailed requirements for many of these future requirements are somewhat uncertain for several reasons including: the current rules allow for extensions to the due dates, and there are several current and anticipated legal challenges to parts of the RSR rules. In addition, BP-Husky submitted requests for extensions for some of the 40 CFR 63 Subparts CC and UUU requirements. For these reasons, references to the Subpart CC and UUU rules in this permit that have future compliance dates reflect the applicable requirements prior to changes promulgated on July 13, 2016. Nevertheless, the permittee shall at all times comply with the effective rules and compliance dates as established by approved extensions, litigation, EPA clarifications, or rule changes as published even if the requirements reflected in the language of this permit are different.	Compliance Review of new Refinery Sector Rule Requirements and Implementation	I	First Quarter Deviation Report, submitted 4-30-21 Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
B015 - Crude 1 Furnace	C. 1. b) (2) a.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B015 - Crude 1 Furnace	C. 1. b) (2) b.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B015 - Crude 1 Furnace	C. 1. c) (2)	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B015 - Crude 1 Furnace	C. 1. f) (1) a.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B019 - Crude/Vac 2 Furnace	C. 2. b) (2) b.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B019 - Crude/Vac 2 Furnace	C. 2. b) (2) e.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B019 - Crude/Vac 2 Furnace	C. 2. c) (2)	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B019 - Crude/Vac 2 Furnace	C. 2. f) (1) c.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B029 - ADHT Furnace	C. 3. b) (2) e.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B029 - ADHT Furnace	C. 3. f) (1) j.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B031 - Vac 1 Furnace	C. 4. b) (2) d.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
B031 - Vac 1 Furnace	C. 4. c) (2)	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B031 - Vac 1 Furnace	C. 4. f) (1) f.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B032 - Coker 3 Furnace	C. 5. b) (2) d.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B032 - Coker 3 Furnace	C. 5. c) (2)	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B032 - Coker 3 Furnace	C. 5. f) (1) j.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
B036 - Reformer 3 Heater	C. 6. b) (1) g.	Record keeping requirements	I	First Quarter Deviation Report, submitted 4-30-21	
B036 - Reformer 3 Heater	C. 6. f) (1) j.		I	First Quarter Deviation Report, submitted 4-30-21	
F001 - Plant Roadways	C. 7. b) (1) c.		I		During an internal audit conducted in 1Q2022, BPH discovered that there were three (3) Fugitive Dust inspection documents where the inspection indicated that watering was required; however, the documentation stating that watering occurred could not be located. There was one (1) deviation during 1Q2021 and two (2) during 2Q2021. Details are included in the cover letter of this report.

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
F001 - Plant Roadways	C. 7. b) (2) c.	Dust Control Contractor's Daily Completion Report	I		During an internal audit conducted in 1Q2022, BPH discovered that there were two (2) Fugitive Dust inspection documents where the inspection indicated that watering was required; however, the documentation stating that watering occurred could not be located. There was one (1) deviation during 1Q2021 and two (2) during 2Q2021. Details are included in the cover letter of this report and in Attachment C.
F001 - Plant Roadways	C. 7. b) (2) e.		I		During an internal audit conducted in 1Q2022, BPH discovered that there were three (3) Fugitive Dust inspection documents where the inspection indicated that watering was required; however, the documentation stating that watering occurred could not be located. There was one (1) deviation during the 1Q2021 and two (2) during the 2Q2021. Details are included in the cover letter of this report and in Attachment C.
F001 - Plant Roadways	C. 7. b) (2) j.		I		During an internal audit conducted in 1Q2022, BPH discovered that there were three (3) Fugitive Dust inspection documents where the inspection indicated that watering was required; however, the documentation stating that watering occurred could not be located. There was one deviation during the 1Q2021 and two during the 2Q2021. Details are included in the cover letter of this report and in Attachment C.

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
F001 - Plant Roadways	C. 7. d) (5) c.		I		During an internal audit conducting during the 1Q2022, BPH discovered that there were three (3) Fugitive Dust inspection documents where the inspection indicated that watering was required; however, the documentation stating that watering occurred could not be located. There was one deviation during the 1Q2021 and two during the 2Q2021. Details are included in the cover letter of this report and in Attachment C.
P007 - FCC & CO Boiler	C. 12. b) (1) a.	Periodic Stack Testing	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21	
P007 - FCC & CO Boiler	C. 12. b) (1) h.		I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P007 - FCC & CO Boiler	C. 12. b) (1) i.		I	Second Quarter Deviation Report, submitted 7-30-21	
P007 - FCC & CO Boiler	C. 12. b) (1) j.	LDAR Records	I	Fourth Quarter Deviation Report, submitted 1-31-22	
P007 - FCC & CO Boiler	C. 12. b) (1) n.	LDAR Records	I	Second Quarter Deviation Report, submitted 7-30-21	
P007 - FCC & CO Boiler	C. 12. b) (1) q.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P007 - FCC & CO Boiler	C. 12. b) (2) a.	Periodic Stack Testing	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21	
P007 - FCC & CO Boiler	C. 12. b) (2) e.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
P007 - FCC & CO Boiler	C. 12. b) (2) f.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P007 - FCC & CO Boiler	C. 12. b) (2) p.	LDAR Records	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P007 - FCC & CO Boiler	C. 12. d) (17) i.	Continuous Parameter Monitoring System (CPMSs)	I	First Quarter Deviation Report, submitted 4-30-21 Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P007 - FCC & CO Boiler	C. 12. e) (2) b. v.	Compliance Management System	I	Fourth Quarter Deviation Report, submitted 1-31-22	There was a reporting deviation in the 4Q2021 report where emissions in tons for the calendar quarter were not reported. The deviation report included a citation for C.12.d)(2)b.v, which does not exist. The correct citation is C.12.e)(2)b.v; therefore, a deviation is being reported from this permit condition.
P007 - FCC & CO Boiler	C. 12. e) (4) b. v.	Compliance Management System	I	Fourth Quarter Deviation Report, submitted 1-31-22	
P007 - FCC & CO Boiler	C. 12. f) (1) c.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P007 - FCC & CO Boiler	C. 12. f) (1) h.	Periodic Stack Testing	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21	
P009 - Sulfur Recovery Unit	C. 13. b) (2) g.	Continuous Monitoring System (CEMS)	I	Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P009 - Sulfur Recovery Unit	C. 13. b) (2) k.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
P009 - Sulfur Recovery Unit	C. 13. d) (7) b.	Continuous Monitoring System (CEMS)	I	Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	There was a deviation of excess SO ₂ emissions (> 250 ppmv SO ₂) in the P009 stack in the 3Q2021 report. The only citation included in the 3Q2021 report was for C.13.b)(2)g; however, this incident is also a deviation from this citation C.13.d)(7)b. BPH is including reference to this citation for the 3Q2021 excess SO ₂ emissions to correct this reference.
P009 - Sulfur Recovery Unit	C. 13. f) (1) b.	Continuous Monitoring System (CEMS)	I	Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	There was a deviation of excess SO ₂ emissions (> 250 ppmv SO ₂) in the P009 stack in the 3Q2021 report. The only citation included in the 3Q2021 report was for C.13.b)(2)g; however, this incident is also a deviation from this citation C.13.f)(1)b. BPH is including reference to this citation for the 3Q2021 excess SO ₂ emissions to correct this reference.
P010 - Crude/Vac 2	C. 14. b) (1) I.	Records Review	I	First Quarter Deviation Report, submitted 4-30-21	A reporting deviation was submitted with the 1Q2021 report because BPH did not submit an Initial Compliance Status report as required by 65.5, referenced by NSPS NNN. The citation in the report was for PTI P0124661 because the condition had not been incorporated into the Title V at that time. This citation is in reference to the Title V Minor Permit Mod, P0128721, which incorporated PTI P0124661.
P011 - Crude/Vac 1	C. 15. b) (1) g.	LDAR visual inspections	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
P011 - Crude/Vac 1	C. 15. b) (1) i.		I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	There was an LDAR deviation for the Crude/Vac 1 unit (P011) in the 2Q2021 report. The deviation report included a deviation from C.15.b)(2)I, which is incorrect. The correct citation is C.15.b)(1)i; therefore a deviation is being reported from this permit condition.
P011 - Crude/Vac 1	C. 15. b) (2) d.		I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P011 - Crude/Vac 1	C. 15. b) (2) f.	LDAR visual inspections	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P011 - Crude/Vac 1	C. 15. b) (2) g.		I	Third Quarter Deviation Report, submitted 10-30-21	
P017 - Coker 2	C. 17. b) (1) f.	LDAR Monitoring	I	First Quarter Deviation Report, submitted 4-30-21 Third Quarter Deviation Report, submitted 10-30-21	
P017 - Coker 2	C. 17. b) (2) e.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P017 - Coker 2	C. 17. b) (2) f.		I	Third Quarter Deviation Report, submitted 10-30-21	
P017 - Coker 2	C. 17. b) (2) g.		I	Third Quarter Deviation Report, submitted 10-30-21	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
P017 - Coker 2	C. 17. b) (2) h.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P025 - Refinery WWT System	C. 18. b) (1)	Program Audit	I	First Quarter Deviation Report, submitted 4-30-21 Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P025 - Refinery WWT System	C. 18. b) (2) c.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P025 - Refinery WWT System	C. 18. b) (2) j. i.	Program Audit	I	First Quarter Deviation Report, submitted 4-30-21 Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P025 - Refinery WWT System	C. 18. b) (2) j. ii.	Program Audit	I	First Quarter Deviation Report, submitted 4-30-21 Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P025 - Refinery WWT System	C. 18. c) (2) l.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P025 - Refinery WWT System	C. 18. c) (3) c.	Review of design drawings and inspection of equipment	I	First Quarter Deviation Report, submitted 4-30-21 Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
P025 - Refinery WWT System	C. 18. c) (3) h.	Field Audit	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21	
P025 - Refinery WWT System	C. 18. c) (3) z.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P025 - Refinery WWT System	C. 18. d) (5) c.	Program Audit	I	First Quarter Deviation Report, submitted 4-30-21 Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P025 - Refinery WWT System	C. 18. f) (2) c.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P036 - Coker 3	C. 19. b) (1) f.		I	Third Quarter Deviation Report, submitted 10-30-21	
P036 - Coker 3	C. 19. b) (1) g.		I	Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P036 - Coker 3	C. 19. b) (2) c.		I	Third Quarter Deviation Report, submitted 10-30-21	
P036 - Coker 3	C. 19. b) (2) e.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
P036 - Coker 3	C. 19. c) (2) a.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
P037 - Sulfur Recovery Unit #2 and #3	C. 20. b) (2) h.	Continuous Monitoring System (CEMS)	I	Fourth Quarter Deviation Report, submitted 1-31-22	
P037 - Sulfur Recovery Unit #2 and #3	C. 20. c) (2) b.	Continuous Pilot Flame Monitoring System	I	Fourth Quarter Deviation Report, submitted 1-31-22	
P037 - Sulfur Recovery Unit #2 and #3	C. 20. d) (11) b.	Continuous Monitoring System (CEMS)	I	Fourth Quarter Deviation Report, submitted 1-31-22	
P037 - Sulfur Recovery Unit #2 and #3	C. 20. e) (2) b. v.	Compliance Management System	I	Fourth Quarter Deviation Report, submitted 1-31-22	
P037 - Sulfur Recovery Unit #2 and #3	C. 20. f) (1) i.	Continuous Monitoring System (CEMS)	I	Fourth Quarter Deviation Report, submitted 1-31-22	
P803 - Reformer 3 Process Unit	C. 24. b) (1) d.	LDAR Monitoring Records	I	Second Quarter Deviation Report, submitted 7-30-21	
P803 - Reformer 3 Process Unit	C. 24. b) (1) g.	LDAR Monitoring Records	I	First Quarter Deviation Report, submitted 4-30-21 Second Quarter Deviation Report, submitted 7-30-21	
P803 - Reformer 3 Process Unit	C. 24. b) (1) j.	LDAR Monitoring Records	I	Second Quarter Deviation Report, submitted 7-30-21	
P803 - Reformer 3 Process Unit	C. 24. b) (2) c.	LDAR Monitoring Records	I	Second Quarter Deviation Report, submitted 7-30-21	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
P803 - Reformer 3 Process Unit	C. 24. b) (2) f.	LDAR Monitoring Records	I	Second Quarter Deviation Report, submitted 7-30-21	
P803 - Reformer 3 Process Unit	C. 24. b) (2) h.	LDAR Monitoring Records	I	First Quarter Deviation Report, submitted 4-30-21 Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	There was an LDAR deviation for the Ref 3 Unit (P803) in the 4Q2021 report. The deviation report included a deviation for B.24.b)(2)h, which is incorrect. The correct citation is C.24.b)(2)h; therefore a deviation is being reported for this permit condition.
P803 - Reformer 3 Process Unit	C. 24. d) (1) d.	Title V Compliance Database - Record Review	I	First Quarter Deviation Report, submitted 4-30-21	Note: This citation was inadvertently included in the 1Q2021 report as C.24.d)(1)(d)c.
T120 - EFR, PR-500132	C. 28. b) (1) d.	Records review and compliance tasking software	I	First Quarter Deviation Report, submitted 4-30-21	
T164 - FR, PR-500295	C. 30. b) (2) b.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
T164 - FR, PR-500295	C. 30. c) (1) o.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
T170 - FR, PR-500294	C. 31. b) (2) b.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
T170 - FR, PR-500294	C. 31. c) (1) o.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group -B2-: B017, B022,	C. 34. b) (2) b.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group -B2-: B017, B022,	C. 34. b) (2) e.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group -B2-: B017, B022,	C. 34. f) (1) a.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group -B3-: B030, B033,	C. 35. b) (2) a.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group -B3-: B030, B033,	C. 35. b) (2) e.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group -B3-: B030, B033,	C. 35. f) (1) l.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group -B4-: B034, B035,	C. 36. b) (2) c.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 (B035 only) Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
Emissions Unit Group - B4 -: B034, B035,	C. 36. b) (2) h.	CEM Maintenance Records	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21	
Emissions Unit Group - B4 -: B034, B035,	C. 36. e) (4) b. v.	Compliance Management System	I	Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group - B4 -: B034, B035,	C. 36. f) (1) a.	Continuous Monitoring System (CEMS)	I	Second Quarter Deviation Report, submitted 7-30-21 (B035 only) Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group - P1 -P021 P022 P023 Alkyl Units	C. 37. b) (1) a.	Visual inspections and LDAR records.	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P1 -P021 P022 P023 Alkyl Units	C. 37. b) (1) d.	Visual inspections and LDAR records.	I	First Quarter Deviation Report, submitted 4-30-21 Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P1 -P021 P022 P023 Alkyl Units	C. 37. b) (2) a.	Visual inspections and LDAR records.	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P1 -P021 P022 P023 Alkyl Units	C. 37. b) (2) b.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
Emissions Unit Group - P1 -P021 P022 P023 Alkyl Units	C. 37. b) (2) e.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group - P2 - Hydrotreaters: P028,P029,	C. 38. b) (1) b.	LDAR Monitoring and Record Keeping Program	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P2 - Hydrotreaters: P028,P029,	C. 38. b) (1) d.	LDAR Monitoring and Record Keeping Program	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P2 - Hydrotreaters: P028,P029,	C. 38. b) (1) h.	LDAR Monitoring and Record Keeping Program	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P2 - Hydrotreaters: P028,P029,	C. 38. b) (2) d.	Continuous Parameter Monitoring System (CPMSs)	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P2 - Hydrotreaters: P028,P029,	C. 38. b) (2) e.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group - P2 - Hydrotreaters: P028,P029,	C. 38. b) (2) i.	LDAR Monitoring and Record Keeping Program	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P3 -: P041,P043	C. 39. b) (1) a.	LDAR Monitoring and Record Keeping Program	I	First Quarter Deviation Report, submitted 4-30-21 Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
Emissions Unit Group - P3 :- P041,P043	C. 39. b) (1) d.	LDAR Monitoring and Record Keeping Program	I	First Quarter Deviation Report, submitted 4-30-21 Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group - P3 :- P041,P043	C. 39. b) (1) f.	LDAR Monitoring and Record Keeping Program	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P3 :- P041,P043	C. 39. b) (1) g.	LDAR Monitoring and Record Keeping Program	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group - P3 :- P041,P043	C. 39. b) (2) b.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group - P3 :- P041,P043	C. 39. b) (2) c.	LDAR Monitoring and Record Keeping Program	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group - P3 :- P041,P043	C. 39. b) (2) e.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group - P3 :- P041,P043	C. 39. b) (2) f.	LDAR Monitoring and Record Keeping Program	I	Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. b) (1) b.	Continuous Parameter Monitoring System (CPMSs)	I	Fourth Quarter Deviation Report, submitted 1-31-22	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
Emissions Unit Group - P4 -Hydrocarbon Flare Systems: P003, P004	C. 40. b) (1) c.	Compliance with 40 CFR 63 Subpart CC requirements	I	Second Quarter Deviation Report, submitted 7-30-21	There was a deviation for the net heating value of the East Hydrocarbon flare (P003) in the 2Q2021 report. The deviation report included a deviation for C.40.b)(1), which is incorrect. The correct citation is C.40.b)(1)f; therefore a deviation is being reported for this permit condition.
Emissions Unit Group - P4 -Hydrocarbon Flare Systems: P003, P004	C. 40. b) (1) d.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P4 -Hydrocarbon Flare Systems: P003, P004	C. 40. b) (1) e.	Continuous Parameter Monitoring System (CPMSs)	I	Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group - P4 -Hydrocarbon Flare Systems: P003, P004	C. 40. b) (1) f.		I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P4 -Hydrocarbon Flare Systems: P003, P004	C. 40. b) (1) g.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. b) (1) h.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. b) (1) i.	Continuous Parameter Monitoring System (CPMSs)	I	Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. b) (2) c.	Root Cause Analysis Reporting	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. b) (2) d.	Continuous Monitoring System (CEMS)	I	First Quarter Deviation Report, submitted 4-30-21	
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. c) (1)		I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. c) (1) c.	Continuous Parameter Monitoring System (CPMSs)	I	Fourth Quarter Deviation Report, submitted 1-31-22	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. c) (1) f.	Continuous Pilot Flame Monitor	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. c) (3) a.	Continuous Parameter Monitoring System (CPMSs)	I	Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. d) (2)	Continuous Mass Flow Meter	I	First Quarter Deviation Report, submitted 4-30-21 Second Quarter Deviation Report, submitted 7-30-21 Third Quarter Deviation Report, submitted 10-30-21 Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. d) (2) a.	Compliance Management System	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. d) (4) k.	Continuous Monitoring System	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. d) (4) m.	Reporting	I	First Quarter Deviation Report, submitted 4-30-21	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. d) (4) t.	Compliance Management System	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. e) (5) b. v.	Compliance Management System	I	Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. e) (6) b. v.	Compliance Management System	I	Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. e) (7)	Compliance Management System	I	Fourth Quarter Deviation Report, submitted 1-31-22	
Emissions Unit Group - P4 - Hydrocarbon Flare Systems: P003, P004	C. 40. f) (5)		I	First Quarter Deviation Report, submitted 4-30-21	
Emissions Unit Group - P6 - Process Units with Fugitives Only: P059, P060, P063,	C. 42. b) (1) a.	LDAR Program monitoring	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P6 - Process Units with Fugitives Only: P059, P060, P063,	C. 42. b) (1) c.	LDAR Program monitoring	I	Second Quarter Deviation Report, submitted 7-30-21	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
Emissions Unit Group - P6 - Process Units with Fugitives Only: P059, P060, P063,	C. 42. b) (1) d.	LDAR Program monitoring	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P6 - Process Units with Fugitives Only: P059, P060, P063,	C. 42. b) (2) a.	LDAR Program monitoring	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P6 - Process Units with Fugitives Only: P059, P060, P063,	C. 42. b) (2) b.	LDAR Program monitoring	I	Second Quarter Deviation Report, submitted 7-30-21	
Emissions Unit Group - P6 - Process Units with Fugitives Only: P059, P060, P063,	C. 42. b) (2) c.	LDAR Program monitoring	I	Second Quarter Deviation Report, submitted 7-30-21	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
Emissions Unit Group -T7 EFR: T016, T017, T018, T020, T021, T024, T025, T026, T027, T028, T029, T030, T031, T032, T033, T034, T035, T036, T037, T038, T039, T040, T041, T044, T059, T060, T085, T090, T091, T096, T097	C. 50. b) (1) c.	Compliance Tasking Database; tank inspections	I	First Quarter Deviation Report, submitted 4-30-21 Third Quarter Deviation Report, submitted 10-30-21 (T016 only)	
Emissions Unit Group -T7 EFR: T016, T017, T018, T020, T021, T024, T025, T026, T027, T028, T029, T030, T031, T032, T033, T034, T035, T036, T037, T038, T039, T040, T041, T044, T059, T060, T085, T090, T091, T096, T097	C. 50. c) (1) b.		I	Third Quarter Deviation Report, submitted 10-30-21 (T032 only)	

Emission Unit(s)	Title V Permit Citation	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Those Documented within Excursion/Deviation Reports Submitted to Toledo Division of Environmental Services (Identify Date of Each Report)	Other - Explain the Nature, Duration, Cause of Excursion/Deviation, and Corrective Actions Taken
Emissions Unit Group - T7 EFR: T016, T017, T018, T020, T021, T024, T025, T026, T027, T028, T029, T030, T031, T032, T033, T034, T035, T036, T037, T038, T039, T040, T041, T044, T059, T060, T085, T090, T091, T096, T097	C. 50. c) (2) c.		I	Third Quarter Deviation Report, submitted 10-30-21 (T032 only)	

Attachment C
F001 Plant Roadway Deviations

EMISSIONS UNIT (EU) NUMBER & DESCRIPTION (See below)	TITLE V PERMIT TERM NO & DESCRIPTION	Reporting Requirement (choose one or both)		ACTUAL METHOD USED TO DETERMINE COMPLIANCE	DEVIATION INFORMATION			PROBABLE CAUSE FOR THE DEVIATION	CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN	WAS DEVIATION ATTRIBUTABLE TO A MALFUNCTION? (Yes or No - If Yes, continue to the next column)	MALFUNCTION VERBAL REPORT DATE (If no reports were made, state "NO REPORTS" in the space below)	MALFUNCTION WRITTEN REPORT DATE (If no reports were made, state "NO REPORTS" in the space below)
		Quarterly	Semi-Annual		DEVIATION DURATION		DESCRIPTION AND MAGNITUDE OF THE DEVIATION					
					Date / Time Start	Date / Time End						
F001 – Plant Roadways	<p>Citation: F001: Part C.7.b(1)c., b(2)c., b(2)e., b(2)f., and d(5)c, [OAC 3745-17-08(B)]</p> <p>The permittee shall employ reasonably available control measures on all paved and unpaved roadways and parking areas for the purpose of ensuring compliance visible fugitive emissions.</p> <p>The permittee shall maintain records that include the dates the control measures were implemented.</p>	X	X	Internal Audit	3/30/2021	4/13/2021	During an internal audit conducting during the 1Q2022, BPH discovered two (2) Fugitive Dust inspection documents for paved and unpaved roadways/ parking areas that indicated that watering was required; however, the documentation stating that watering occurred could not be located. This deviation was not previously reported on the 1H21 Semiannual report.	The need for watering persisted for two weeks, however, by the third weekly visual inspection, no need for watering was documented; therefore, watering or dust suppression control was likely implemented.	Re-emphasized the need for watering activities to occur on the day fugitive dust inspection reports observation of dust on roadways/parking area with watering contractor. Current Dust Control Coordinator reviews each inspection as it is submitted and ensures watering report is filed with Dust Control Coordinator .	No	No Report	No Report
F001 – Plant Roadways	<p>Citation: F001: Part C.7.b(1)c., b(2)c., b(2)e., b(2)f., and d(5)c, [OAC 3745-17-08(B)]</p> <p>The permittee shall employ reasonably available control measures on all paved and unpaved roadways and parking areas for the purpose of ensuring compliance visible fugitive emissions.</p> <p>The permittee shall maintain records that include the dates the control measures were implemented.</p>	X	X	Internal Audit	5/25/2021	6/1/2021	During an internal audit conducting during the 1Q2022, BPH discovered one (1) Fugitive Dust inspection documents for unpaved roadways/ parking areas that indicated that watering was required; however, the documentation stating that watering occurred could not be located. This deviation was not previously reported on the 1H21 Semiannual report.	BPH assumes this was an inadvertent error since the need for dust suppression was not recorded during the next weekly visual inspection	Re-emphasized the need for watering activities to occur on the day fugitive dust inspection reports observation of dust on roadways/parking area with watering contractor. Current Dust Control Coordinator reviews each inspection as it is submitted and ensures watering report is filed with Dust Control Coordinator .	No	No Report	No Report